

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JEREMY HOLLINS )  
Plaintiff, )  
 )  
v. )  
 )  
CITY OF WEST SPRINGFIELD, )  
THOMAS SUDNICK, )  
JOSEPH WOLOWICZ, JOSEPH CASEY, )  
NATHAN O'BRIEN, ADAM POLASTRY, )  
RONALD CAMPURCIANI, )  
JOHN/JANE DOES (current of former )  
employees of the City of West Springfield,) )  
and MIIA Property and Casualty Group, )  
Inc., )  
Defendants. )  
\_\_\_\_\_ )

**Civil Action No.: 3:20-CV-10628-MGM**

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Plaintiff and all Defendants (the “West Springfield police Defendants”) except MIIA Property and Casualty Group, Inc., the claims against which have been severed and stayed, jointly move that the deadline for completion of non-expert discovery be extended to December 31, 2021, and the scheduling order be amended correspondingly. In support of their motion, the parties state that, due to the COVID-19 pandemic, they agreed among themselves: (1) to postpone the deposition of the Plaintiff Jeremy Hollins until it could be safely conducted in person, on July 15, 2021; and (2) to defer depositions of the West Springfield police Defendants pending settlement discussions following Plaintiff’s deposition. Accordingly, the parties respectfully request that the initial scheduling order be amended as follows:

	<b><u>Current</u></b>	<b><u>Proposed</u></b>
Completion of non-expert discovery	06/04/2021	12/31/2021
Case Management Conference	06/14/2021	TBD

Plaintiff's expert designation and disclosure	07/21/2021	02/18/2022
Defendant's expert designation and disclosure	08/16/2021	03/04/2022
Completion of expert depositions	10/15/2021	05/13/2022
Dispositive Motions (file by date)	01/07/2022	07/29/2022
Oppositions to Motions (file by date)	02/07/2022	08/29/2022
Replies to oppositions (file by date)	02/18/2022	09/13/2022
Dispositive Motions (heard by date)	03/14/2022	09/23/2022

PLAINTIFF  
JEREMY HOLLINS  
By his attorney,

/s/ Michael J. Grace  
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DEFENDANTS  
THE CITY OF WEST SPRINGFIELD,  
THOMAS SUDNICK, JOSEPH WOLOWICZ,  
JOSEPH CASEY, NATHAN O'BRIEN, ADAM  
POLASTRY, and RONALD CAMPURCIANI,  
By their attorneys,

/s/ Nancy Frankel Pelletier  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 3<sup>rd</sup> day of June, 2021.

/s/ Michael J. Grace  
Michael J. Grace